

INDEX OF MATTERS BEING FILED

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Petition	C
First Amended Petition	D
Return of Service	E

ATTACHMENT A

LIST OF COUNSEL OF RECORD

Counsel for Plaintiff Transamerica Investment Group, Inc. dba Sky Cargo Solutions:

William W. Rucker
3355 West Alabama, Suite 825
Houston, Texas 77093
713 528-2800

Counsel for Defendant Travis M. Hamilton

Michael S. Forshey
Constance R. Ariagno
Patton Boggs LLP
2000 McKinney Ave. Suite 1700
Dallas, Texas 75201
214 758-1500

ATTACHMENT B

HCDistrictclerk.com

TRANSAMERICA INVESTMENT GROUP INC (DBA
SKY CARGO S vs. HAMILTON, TRAVIS M
Cause: 201207149 CDI: 7 Court: 165

4/10/2012

APPEALS

No Appeals found.

COST STATEMENTS

No Cost Statements found.

TRANSFERS

No Transfers found.

POST TRIAL WRITS

No Post Trial Writs found.

ABSTRACTS

No Abstracts found.

SETTINGS

No Settings found.

DOCUMENTSProper credentials required. Please [login](#) or contact Harris County District Clerk's Office at (713) 755-7300.**SUMMARY****CASE DETAILS**

File Date	2/3/2012
Case (Cause) Location	Civil Intake 1st Floor
Case (Cause) Status	Active - Civil
Case (Cause) Type	BREACH OF CONTRACT
Next/Last Setting Date	N/A

COURT DETAILS

Court	165 th
Address	201 CAROLINE (Floor: 12) HOUSTON, TX 77002 Phone:7133686270
JudgeName	Josefina Muniz Rendon
Court Type	Civil

ACTIVE PARTIES

Name	Type	Post	Attorney
		Jdgmt	
TRANSAMERICA INVESTMENT GROUP INC (DBA SKY CARGO SOLUTIONS INC)	PLAINTIFF - CIVIL		RUCKER, WILLIAM W. JR.
HAMILTON, TRAVIS M	DEFENDANT - CIVIL		
SKY CARGO SOLUTIONS INC	PLAINTIFF - CIVIL		RUCKER, WILLIAM W. JR.
HAMILTON, TRAVIS M BY SERVING THE TEXAS SECRETARY OF STATE 1019 BRAZOS	REGISTERED AGENT		

INACTIVE PARTIES

No inactive parties found.

JUDGMENT/EVENTS

Date	Description	Order Signed	Post Jdgmt	Pgs	Attorney
3/1/2012	AMENDED ORIGINAL PETITION		0		RUCKER, WILLIAM W. JR.
2/3/2012	ORIGINAL PETITION		0		RUCKER, WILLIAM W. JR.
2/3/2012	ORIGINAL PETITION		0		RUCKER, WILLIAM W. JR.

SERVICE

Type	Status	Instrument	Person	Requested	Issued	Served	Returned	Received	Tracking	Deliver To
CITATION (SECRETARY OF STATE NON- RESIDENT)	SERVICE EXECUTED	ORIGINAL PETITION	HAMILTON, TRAVIS M BY SERVING THE TEXAS SECRETARY OF STATE 1019 BRAZOS STREET AUSTIN TEXAS 78701 FORWARD TO:	2/3/2012	2/6/2012	2/16/2012	3/12/2012	3/26/2012	72748819	MAIL TO ATTORNEY
CITATION (NON- RESIDENT)	SERVICE ISSUED / IN POSSESSION	AMENDED ORIGINAL PETITION	HAMILTON, TRAVIS M BY SERVING THE TEXAS SECRETARY OF STATE 1019 BRAZOS STREET AUSTIN TEXAS 78701 FORWARD TO:	3/1/2012	3/5/2012				72758421	MAIL TO ATTORNEY

ATTACHMENT C

2012-07149 / Court: 165

NO. _____

Filed 12 February 3 P4:04
Chris Daniel - District Clerk
Harris County
ED101J016711546
By: Nelson Cuero

TRANSAMERICA INVESTMENT
GROUP, INC. dba SKY CARGO
SOLUTIONS, INC.

IN THE DISTRICT COURT OF

V.

HARRIS COUNTY, TEXAS

TRAVIS M. HAMILTON

JUDICIAL DISTRICT COURT

PLAINTIFF'S ORIGINAL PETITION

TransAmerica Investment Group, Inc. dba Sky Cargo Solutions, Inc. ("Plaintiff") files this suit against Travis M. Hamilton ("Defendant").

I. DISCOVERY CONTROL PLAN

1. Plaintiff intends to conduct discovery under Level 2 as set forth in Texas Rule of Civil Procedure 190.3.

II. PARTIES

2. Plaintiff is a Texas corporation.

3. Defendant is an individual who conducts business in the State of Texas but who is currently residing in Oklahoma. Defendant has not designated a resident agent for service of process in Texas and may be served by serving the Texas Secretary of State, 1019 Brazos Street, Austin, Texas 78701. Defendant's residence is 6516 North Georgetown Road, Edmond, Oklahoma Count, Oklahoma 73034. Citation is requested at this time.

III. VENUE AND JURISDICTION

4. Venue is proper in this Harris County as Plaintiff's principal place of business is in this county. This Court has jurisdiction over this cause as Defendant has purposefully availed himself of the privileges and benefits of conducting business in the State of Texas

IV. FACTS

5. In May, 2009, Plaintiff was approached by Defendant who needed assistance in finding financing for the purchase and sale of the following six Citation X aircraft:

<u>TITLE ORDER #</u>	<u>PRIOR REG</u>	<u>MSN</u>	<u>YEAR</u>
15998	N77OXJ	750-0270	2007
15999	N776XJ	750-0276	2007
16000	N778XJ	750-0278	2007
16001	N784XJ	750-0284	2007
16002	N786XJ	750-0286	2008
16003	N787XJ	750-0287	2008

6. Plaintiff did indeed find financing for Defendant at PNC Bank and the purchase and sale of the foregoing aircraft was consummated in the fall of 2009.

7. Although Defendant originally offered Plaintiff a 1% commission, on July 17, 2009 Defendant contracted in writing to give Plaintiff a fee of \$50,000 for each of the six aircraft, payable as they are sold.

8. Although the six aircraft were subsequently sold, Defendant failed to make any payment to Plaintiff. Plaintiff has made repeated demands for payment but no payment has been forthcoming.

V. CAUSES OF ACTION

A. Breach of Contract

9. Plaintiff incorporates herein the provisions of Section IV above.

10. Defendant breached his contract with Plaintiff by failing to pay Plaintiff the \$300,000 fee to which Plaintiff was entitled. Plaintiff brings suit hereunder for said \$300,000 fee.

11. Due to Defendant's breach of contract, Plaintiff has been required to retain the undersigned attorney to prosecute its claims against Defendant. Plaintiff also seeks to recover its reasonable attorney's fees under Chapter 38 of the Texas Civil Practice & Remedies Code.

B. Quantum Meruit.

12. Plaintiff incorporates herein the provisions of Section IV above.

13. Plaintiff provided services that were accepted by Defendant. Defendant had notice that Plaintiff expected to be paid for its services. Plaintiff brings this suit to recover the reasonable amount of its services, not less than \$300,000.00. Plaintiff also brings suit hereunder to recover its attorney fees.

VI. CONDITIONS PRECEDENT

14. All conditions precedent have been performed or have occurred.

CONCLUSION

Plaintiff prays that Defendant be cited to appear and answer and the Court award judgment in favor of Plaintiff against Defendants for the following:

- actual damages of not less than \$300,000.00;
- prejudgment interest and post-judgment interest
- reasonable attorney's fees;
- costs of court; and
- all other relief, at law and in equity, to which it is justly entitled.

Respectfully submitted,



William W. Rucker
TBA No. 17366500



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this February 3, 2012

Certified Document Number: 51252122 Total Pages: 4

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

ATTACHMENT D

Filed 12 March 1 P1:31
Chris Daniel - District Clerk
Harris County
ED101J016754940
By: anita perez

NO. 201207149

TRANSAMERICA INVESTMENT
GROUP, INC. dba SKY CARGO
SOLUTIONS, INC.

V.

TRAVIS M. HAMILTON

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

165TH JUDICIAL DISTRICT COURT

FIRST AMENDED PLAINTIFF'S PETITION

TransAmerica Investment Group, Inc. dba Sky Cargo Solutions, Inc. ("Plaintiff") files this First Amended Plaintiff's Petition suit against Travis M. Hamilton ("Defendant").

I. DISCOVERY CONTROL PLAN

1. Plaintiff intends to conduct discovery under Level 2 as set forth in Texas Rule of Civil Procedure 190.3.

II. PARTIES

2. Plaintiff is a Texas corporation.

3. Defendant is an individual who conducts business in the State of Texas but who is currently residing in Oklahoma. Defendant has not designated a resident agent for service of process in Texas and may be served by serving the Texas Secretary of State, 1019 Brazos Street, Austin, Texas 78701. Defendant's residence is 5616 North Georgetown Road, Edmond, Oklahoma County, Oklahoma 73034. Citation is requested at this time.

III. VENUE AND JURISDICTION

4. Venue is proper in this Harris County as Plaintiff's principal place of business is in this county. This Court has jurisdiction over this cause as Defendant has purposefully availed himself of the privileges and benefits of conducting business in the State of Texas

IV. FACTS

5. In May, 2009, Plaintiff was approached by Defendant who needed assistance in finding financing for the purchase and sale of the following six Citation X aircraft:

<u>TITLE ORDER #</u>	<u>PRIOR REG</u>	<u>MSN</u>	<u>YEAR</u>
15998	N770XJ	750-0270	2007
15999	N776XJ	750-0276	2007
16000	N778XJ	750-0278	2007
16001	N784XJ	750-0284	2007
16002	N786XJ	750-0286	2008
16003	N787XJ	750-0287	2008

6. Plaintiff did indeed find financing for Defendant at PNC Bank and the purchase and sale of the foregoing aircraft was consummated in the fall of 2009.

7. Although Defendant originally offered Plaintiff a 1% commission, on July 17, 2009 Defendant contracted in writing to give Plaintiff a fee of \$50,000 for each of the six aircraft, payable as they are sold.

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10. Defendant breached his contract with Plaintiff by failing to pay Plaintiff the \$300,000 fee to which Plaintiff was entitled. Plaintiff brings suit hereunder for said \$300,000 fee.

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B. Quantum Meruit:

12. Plaintiff incorporates herein the provisions of Section IV above.

13. Plaintiff provided services that were accepted by Defendant. Defendant had notice that Plaintiff expected to be paid for its services. Plaintiff brings this suit to recover the reasonable amount of its services, not less than \$300,000.00. Plaintiff also brings suit hereunder to recover its attorney fees.

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CONCLUSION

Plaintiff prays that Defendant be cited to appear and answer and the Court award judgment in favor of Plaintiff against Defendants for the following:

- actual damages of not less than \$300,000.00;
- prejudgment interest and post-judgment interest
- reasonable attorney's fees;
- costs of court; and
- all other relief, at law and in equity, to which it is justly entitled.

Respectfully submitted,



William W. Rucker
TBA No. 17366500

3355 West Alabama, Suite 825
Houston, TX 77098
Telephone: 713-528-2800
Facsimile: 713-528-5011
Attorney for Plaintiff,
TransAmerica Investment Group, Inc.



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this March 6, 2012

Certified Document Number: 51504710

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

ATTACHMENT E



PL

The State of Texas

Secretary of State

2012-210394-1

FILED
Chris Daniel
District Clerk
MAR 12 2012
Time: _____
By _____
Harris County, Texas
Deputy

I, the undersigned, as Secretary of State of Texas DO HEREBY CERTIFY that according to the records of this office, a copy of the Citation and Plaintiff's Original Petition in the cause styled:

Transamerica Investment Group Inc dba Sky Cargo S VS Travis M Hamilton
165th Judicial District Court Of Harris County, Texas
Cause No: 201207149

was received by this office on February 13, 2012, and that a copy was forwarded on February 16, 2012, by CERTIFIED MAIL, return receipt requested to:

Travis M Hamilton
6516 North Georgetown Road
Edmond, OK 73034

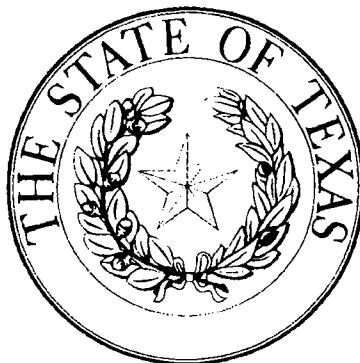
The RETURN RECEIPT was received in this office dated February 23, 2012, bearing the Signature Of Addressee's Agent.

FILED
Chris Daniel
District Clerk
MAR 12 2012
Time: _____
By _____
Harris County, Texas
Deputy

Date issued: February 28, 2012

A handwritten signature in black ink, appearing to read "Hope Andrade".

Hope Andrade
Secretary of State



RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging

ST/lsv

The State of Texas

Citations Unit
P.O. Box 12079
Austin, Texas 78711-2079



Phone: 512-463-5560
Fax: 512-463-0873
TTY (800) 735-2989
www.sos.state.tx.us

Secretary of State

February 28, 2012

William W. Rucker, Jr.
William W Rucker Attorney At Law
3355 West Alabama Ste 825
Houston, TX 77098

2012-210394
Include reference number in
all correspondence

RE: Transamerica Investment Group Inc dba Sky Cargo S VS Travis M Hamilton
165th Judicial District Court Of Harris County, Texas
Cause No: 201207149

FILED
Chris Daniel
District Clerk
MAR 12 2012
Time: _____
By _____
Harris County, Texas
Deputy

Dear Sir/Madam:

Please find enclosed your Certificate(s) of Service for the case styled above.

If this office may be of further assistance to you, please do not hesitate to contact us.

Sincerely,

Louis S. Villarreal

Louis S. Villarreal
Citations Unit

Enclosure